

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

<b>Illinois Commerce Commission</b>	)	
<b>On its Own Motion</b>	)	
	)	<b>Docket No. 01-0662</b>
<b>Investigation concerning Illinois Bell</b>	)	
<b>Telephone Company's compliance</b>	)	
<b>With Section 271 of the</b>	)	
<b>Telecommunications Act of 1996</b>	)	

**RESPONSE OF AT&T COMMUNICATIONS OF ILLINOIS, INC.  
TO MCLEODUSA TELECOMMUNICATIONS SERVICES, INC.'S MOTION TO  
HOLD ISSUANCE OF FINAL ORDER IN ABEYANCE AND CONDITIONAL  
REQUEST FOR FURTHER HEARINGS**

AT&T Communications of Illinois, Inc. ("AT&T"), pursuant to the Commission's Notice of May 8, 2003, hereby responds to the Motion to Hold Issuance of Final Order in Abeyance And Conditional Request for Further Hearings filed by McLeodUSA Telecommunications Services, Inc. ("McLeod Motion") also dated May 8.

AT&T supports the McLeod Motion, for the reasons set forth therein. In particular, if SB 885 becomes law in its current form, the resulting UNE rates would fail to comply with the FCC's TELRIC methodology and principles. Additionally, the resulting UNE rates would cause a "price squeeze" for Illinois CLECs providing local service in Illinois, thereby raising a serious issue of whether SBC Illinois's Section 271 application is consistent with the public interest, convenience and necessity, and whether the local exchange market in SBC Illinois's territory is "open and will remain so" after the grant of Section 271 authority, as the FCC requires. *See Application of Ameritech*

*Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, to Provide In-Region, InterLATA Services in Michigan, CC Docket No. 97-137, 12 FCC Rcd 20543, ¶¶ 391, 397 (1977); Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of New York, CC Docket No. 99-295, ¶¶ 431, 444 (December 1999); Application by SBC Communications Inc., Southwestern Bell Telephone Company, And Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services in Texas, CC Docket No. 00-65, ¶ 431 (June 30, 2000).*

WHEREFORE, AT&T Communications of Illinois, Inc. respectfully supports the McLeod Motion and the relief requested therein.

Respectfully submitted,

AT&T COMMUNICATIONS OF ILLINOIS, INC.

By:

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